## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO **EASTERN DIVISION**

UNITED STATES OF AMERICA, CASE NO. 1:16CR224

Plaintiff,

CHIEF JUDGE PATRICIA A. GAUGHAN

/s/ Patricia A. Gaughan

-VS-

RADU MICLAUS,

**DEFENDANT'S MOTION FOR LEAVE** 

TO FILE TRIAL EXHIBITS UNDER

SEAL FOR APPEAL PURPOSES Defendant.

Defendant Radu Miclaus through counsel, respectfully moves this Honorable Court for an order permitting the filing of trial exhibits entered in this case, under seal. The reason for this request is that counsel refers to the trial exhibits in her appellate brief, however, the exhibits contain personal information of alleged victims that should not be made public. Specifically, counsel wishes to file Government's Trial Exhibit numbers 1204, 1333, 2043, and 2044 under seal. Counsel states that oral argument in the appeal has been set for March 3, 2021, and therefore requests expedited ruling on this request.

Respectfully submitted,

STEPHEN C. NEWMAN Federal Public Defender Ohio Bar: 0051928

/s/ Catherine Adinaro Shusky CATHERINE ADINARO SHUSKY Attorney at Law Office of the Federal Public Defender Ohio Bar: 0088731 1660 W.2<sup>nd</sup> Street, Ste. 750